**Before the**
**FEDERAL COMMUNICATIONS COMMISSION**
**Washington, D.C. 20554**

**In the Matter of:**

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| **Petition for Rulemaking to Allow the MA-3 All-Digital Mode of HD Radio for AM Stations** | **)** | **RM-11836** |
| **Revitalization of the AM Radio Service** | **)** | **MB Docket No. 13-249** |

## COMMENTS OF TRIGNITION MEDIA

Trignition Media, a Limited Liability Company as registered in the State of Connecticut and licensee of radio stations WRYM-AM and WWCO-AM, and their constituent companion FM translators is pleased to offer comments to the instant above captioned Petition for Rulemaking as filed by Bryan Broadcasting Corporation ("BBC") to allow AM Stations to voluntary use the MA3 All-Digital Modulation mode (The "BBC Petition").

We are in complete agreement as to the reasons stated in the BBC petition that the all-digital process is represents in part a significant solution to overcoming the varied limiting factors to receiving quality signals in today's AM reception environment. The MA3 broadcast mode offers audio quality and additional data service parity with other digital media services as expected by today's consumers and of which will never be available within the AM paradigm. Levels and contributors of RF noise have increased exponentially over the past 30 years and have created an environment in which signal levels cannot overcome the noise and are evident and objectionable to the listener. Traditional amplitude modulation receivers by their nature will receive these undesired signals along with desired content together to create resultant audio of compromised quality filled with noise. Digital modulation schemes, while not immune to RF noise, will not interpret RF noise as part of the program stream and will by nature not incorporate this noise into the audio as decoded and portrayed to the listener. Only when compromising interference reaches a threshold high enough to overcome the robust digital error correction and time diversity mechanisms inherent in the MA3 transmission mode will artifacts or drop to silence be the result. The MA3 digital mode can encounter and tolerate a much

higher RF interference presence while maintaining high quality audio delivery comparable to MP3, AAC and other high-fidelity services that today's listeners are accustomed to. The HD Radio MA3 Mode allows AM stations the potential to be competitive within music formats at relevant quality level that consumers have come to accept. AM listenership continues to erode, and digital modulation offers a leap forward in audio quality and data service potential that traditional AM cannot achieve. The number of MA3 capable receivers in the automotive sector is approaching the 60-million-unit mark and represents and strong entry point for the feasibility of stations choosing to use the MA3 All Digital mode to reach these receivers. Additionally, with the advent of many AM stations having successfully acquired and deployed fill in FM translators it can act as a catalyst for stations to make the choice and investment in broadcasting on their AM stations in the MA3 mode. We further believe that current proceedings addressing adjustments to current protection ratios and the use of digital synchronous boosters, if adopted, could tremendously improve the options and reliability of the MA3 and further to be developed modes of digital medium wave broadcasting,

We respectfully encourage the Commission to open a proceeding on the BBC Petition to use the HD Radio MA3 All-Digital Modulation Mode.

Respectfully Submitted,

May 12, 2019

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